



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 300
DENVER, COLORADO 80202-2466



FEB 13 2002

Ref: 8P-W-GW

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Theresa Santangelo-Dreiling
CDOT Project Manager
State of Colorado Department of Transportation
Office of Environmental Services
15285 South Golden Road
Building 47
Golden, Colorado 80401

Re: UNDERGROUND INJECTION CONTROL (UIC)
Class V Injection Well
Rule Authorization Modification
Injection as Part of Presumptive Remedy
CDOT Region 6 Headquarters Facility
(EPA File #CO5000-04976)

Dear Ms. Santangelo-Dreiling:

The Environmental Protection Agency (EPA) has reviewed the January 24, 2002 version of the "Description and Evaluation of the Presumptive Remedy for the Dry Well Area" at the above referenced site submitted on behalf of the Colorado Department of Transportation by Harding ESE. EPA has decided, pursuant to Title 40 Code of Federal Regulations (40 CFR), §144.24 (as modified in part January 3, 1994), that a permit is not necessary at this time for the proposed injection activity. However, this activity is subject to the Rule Authorization requirements outlined in 40 CFR, including, but not limited to, §144.11, §144.24, and §144.27 (as modified in part January 3, 1994). This Rule Authorization is limited to injection activity at the Region 6 Headquarters Facility located at 2000 South Holly Street in Denver, Colorado, and is valid until January 31, 2010 for:

The injection of nutrients, such as ammonium nitrate and potassium phosphate, hydrogen peroxide, methane and a potassium bromide tracer into the locations indicated in "Description and Evaluation of the Presumptive Remedy for the Dry Well Area" dated January 24, 2002, (Section 3.0 of the Final Corrective Measures Work Plan) approved by the Colorado Department of Public Health and Environment (CDPHE) December 20, 2001.

Based on our understanding of the contamination present at the site and the planned injection activities, EPA believes this injection will not adversely impact ground water. For this reason, you may proceed with the proposed program and you will not be required to operate under an Underground Injection Control Permit at this time.

Any changes in operating methods, the proposed time frame for the remediation activity, or any other conditions specified in above referenced documentation, *must be approved in advance* by the EPA. If nitrate is detected in any of the down gradient monitoring wells at a concentration above 10 mg/l, please notify EPA verbally within 24 hours of receiving the analytical results. Please be advised that this rule authorization pertains to Underground Injection Control (UIC) solely and does not relieve you from satisfying CDPHE requirements for total site remediation. Nor is it the intent of this authorization to preclude any other federal, state or local regulations that may apply.

Please send all correspondence to:

U. S. Environmental Protection Agency
Attention: Valois Shea
MAIL CODE: 8P-W-GW
999 18th Street, Suite 300
Denver, CO 80202-2466

If you have any questions concerning this rule authorization, or for interpretation of Class V regulations, policies, and guidance, please contact Valois Shea at (303) 312-6276.

Sincerely,



D. Edwin Hogle
Director
Groundwater Program
Office of Partnerships and Regulatory Assistance

cc: Paul H. Weaverling, Harding ESE
1627 Cole Blvd.
Golden, CO 80401